

Exhibit C

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -

5 IN RE: NATIONAL)
6 PRESCRIPTION) MDL No. 2804
7 OPIATE LITIGATION)
8 _____) Case No.
9) 1:17-MD-2804
10 THIS DOCUMENT RELATES)
11 TO ALL CASES) Hon. Dan A. Polster
12 - - -

13 Tuesday, August 7, 2018
14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW
16
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18
19 Videotaped deposition of Jennifer R. Norris,
20 held at the offices of BakerHostetler, 200 Civic Center
21 Drive, Suite 1200, Columbus, Ohio, commencing at
22 8:09 a.m., on the above date, before Carol A. Kirk,
23 Registered Merit Reporter and Notary Public.
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31 deps@golkow.com

1 DEA's expectations and that it is not dictated to
2 us by the agency pursuant to a regulatory action."

3 Correct?

4 A. I see that sentence.

5 Q. And was this prior to the initiation of
6 the regulatory action --

7 MS. MAINIGI: Objection to form.

8 Q. -- or do you know?

9 A. I believe that the orders to show cause
10 were issued after that.

11 Q. And Mr. Reardon wanted to try to prevent
12 a regulatory action being forced to adopt any sort
13 of policies and procedures on suspicious order
14 monitoring program, correct?

15 A. Mr. Reardon understood the obligations
16 that the DEA was implementing, the new obligations
17 relating to the shipping requirement, and wanted
18 to make sure that we had a program implemented
19 that would comply with those new -- the new
20 guidance.

21 Q. But you said they told you about them
22 way back in 2006, right?

23 A. The initial communication from
24 Rannazzisi was in 2006.

1 Q. And you still hadn't done anything to
2 implement them now in September of 2007, correct?

3 A. I cannot --

4 MS. MAINIGI: Objection; form.

5 A. I cannot presently say the corporation
6 doesn't have present knowledge of the actions that
7 we took and the timing of what those actions that
8 we took in that period.

9 Q. So if I understand you correctly, you
10 don't have knowledge as to what actions you,
11 Cardinal, took during that time frame; is that
12 correct?

13 A. I don't know the timing and the actions
14 taken during the time period --

15 Q. So you can't tell me --

16 A. -- based on current knowledge.

17 Q. So sitting here after prepping for
18 three, three and a half weeks, whatever it was,
19 you still can't tell us what action Cardinal took
20 from the time it was told it had a shipping
21 requirement for almost a year, as to what they did
22 in relation to that new obligation or what they
23 considered a new obligation?

24 MS. MAINIGI: Objection to form.

1 Misstates her testimony.

2 A. The corporation does not have present
3 knowledge about the actions and timing of the
4 actions that were taken during that period
5 presently.

6 Q. How doesn't the corporation know what it
7 did?

8 MS. MAINIGI: Objection.

9 Q. Was it taking any medication in the time
10 that would inhibit its ability to remember?

11 MS. MAINIGI: You don't need to answer
12 that question.

13 Q. How does the corporation not know what
14 it did for a year?

15 MS. MAINIGI: Objection to form.

16 A. The corporation does not presently have
17 knowledge of the timing and actions taken during
18 the period presently.

19 Q. Does it expect to somehow magically get
20 knowledge at some point in time?

21 MS. MAINIGI: Objection to form.

22 Outside the scope.

23 A. I believe this case and the discovery
24 related to it is continuing.

1 Q. So you think the corporation may
2 discover what it did ten or eleven years ago at
3 some future point in time? Is that your
4 testimony?

5 MS. MAINIGI: Objection to form.

6 A. The corporation cannot presently say
7 that -- speak regarding what it was doing in the
8 timing during that period.

9 Q. When can it speak to when it first took
10 action; do you know?

11 MS. MAINIGI: Objection to form.

12 A. No.

13 Q. So sitting here today, the corporation
14 can't answer when it first took action related to
15 the Rannazzisi letter of 2006, correct?

16 A. I cannot say right now.

17 Q. Turn to the next page, please. Do you
18 see "Key Takeaways"?

19 A. Yes.

20 Q. And, there again, in this summary from
21 HDMA being provided to its members is again the
22 DEA's position on suspicious orders and that they
23 have a stop shipment or a due diligence
24 requirement, correct? I'm sorry. It's under the